

Exhibit B

Khusanov Letters to Court

TRULINCS 52578424 - KHUSANOV, DILSHOD - Unit: BRO-I-C

FROM: 52578424
TO: Colson, Deborah; Levitt, Richard
SUBJECT: Letter to the Judge
DATE: 07/07/2022 09:58:44 AM

To:

Hon. William F. Kuntz II
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

July 07, 2022

Dear Judge,

When my first son [REDACTED] was born I was on cloud nine - like any other father who loves to have children. When my wife started breast-feeding him, the milk he drank was coming out of his nose and we did not know why, because neither pediatricians nor Ob/Gyn doctors told us that he was born with cleft pallet. In fact, they failed to detect the cleft on his upper pallet. We managed to get him an early plastic surgery. The surgery was successful, at least from the plastic surgery point of view, but with it came another problem - he stopped responding, reacting and socializing. We did not understand what was going on with him because a cheerful and playful boy, all of a sudden, dramatically changed for worse.

At the beginning the doctors were not sure, but soon after the surgery as his condition worsened rapidly and his symptoms were more and more obvious they finally diagnosed him with autism. It broke our hearts but our faith in God's mercy and His ultimate wisdom gave us hope to stay optimistic and fight for his recovery.

We enrolled him in different early intervention therapies. I started spending most of my time with him, taking him to a number of activities like soccer fields, swimming pools, parks, various entertainments and wherever I thought he could play and interact with other kids hoping it would trigger his recovery process. None of them seemed helpful or promising.

Not long before my arrest I found a very good and promising private institution that had a good reputation on treating autistic children. It was little bit expensive and his insurance did not want to cover that. I did not have means to take him to that school immediately, so I started saving money.

Then came August 31, 2017. Right after the dawn prayers I was arrested. All my plans to take my son to that treatment collapsed in one day. Me and my wife have two other kids and my wife is a house-maker. She could not afford the treatment expenses. So we had to leave the idea there.

For the last five years since my arrest she has been struggling to raise all three of them while at the same time enrolling [REDACTED] in different, both state and private, school programs that were covered by Medicaid. Unfortunately none of them helped our son. He is six and a half years old. He neither speaks nor socializes with any other kids, not even with his siblings who are eight and five and a half. And he can not even use bathroom on his own. He communicates all his needs including need for food and drink by pointing to the objects.

As I'm writing this letter, God is my witness, my eyes are filling up with tears out of sorrow and compassion for poor and helpless boy. As a father I could not do anything worthy to help him. On top of that I put myself in a situation where I can miss all those crucial years when he needs me to get him the best and uninterrupted treatment program. I hope and pray that it won't be too late before I reunite with my family.

It tears my heart apart when I think of the time when he grows up, fully or partially recovering, asks me a question: "Daddy, why I don't have many friends like other boys?", or "Why can't I go to college?". Honestly, I don't know how I'm going to answer him, except maybe with tears rolling down my cheeks: "Because your stupid and ignorant dad, who loved you more than himself, made one of the biggest mistakes and wrong decisions in his life and ended up being in jail while you needed him most. And he failed to provide you with proper treatment. And that's why you are in this situation right now, and that's why you don't have many friends, and that's why you can't go to college because you did not develop necessary social and cognitive skills to interact with people and to understand and learn academic subjects." I hope and pray he fully recovers and I don't have to tell him those things.

TRULINCS 52578424 - KHUSANOV, DILSHOD - Unit: BRO-I-C

When I ask myself a question if I learned my lesson, the first thing that comes to my mind is my handicap son, my family and my aging parents whom I caused a lot of pain and anguish. I hardly find the right words to express the state of my heart and mind. I wish I could describe how much I missed my whole family and how much I want to be with them, to hug my parents whom I haven't seen for more than eleven years, to kiss my wife who I have not been in privacy with for five years and to hold my kids and play with them, who barely can recognize me. And I believe that answers my question. But I'd rather let you judge.

One of the things I realized and learned while in here is that most of the time we can't see how much blessings we are conferred at any given moment until we lose those blessings. And if we do not appreciate what we already have, we will never appreciate when we are given more.

You must have seen, throughout your career, many many defendants and convicts. And you must have already seen how hard for them to keep a clean record, stay out of the trouble, enroll in useful and productive programs, learn new things and constantly improve their character and work on their shortcomings. Very humbly and honestly I can say that I managed, to some extent, to do all of that for the past five years.

In this volatile institution, like MDC Brooklyn, where anytime anything can pop up that can throw you off balance, it is extremely hard to steer clear of all negative things and stay cool and motivated all the time. Unless you are truly dedicated and committed to a higher goal and can see a bright future beyond the walls of the jail, it is very very easy to be pulled into something harmful.

I know I'm not a perfect person and I've never been one, but like late John McCain said "I'm a man full of mistakes but I'm a strong believer in redemption" I can say that I'm that kind of person too, and I'm really really tired of making the same mistakes. More or less, for the past five years, I learned and truly dedicated myself not to make the same mistakes twice. With the help of God and enormous love from my parents, family and friends I'm trying to be better son, better husband, better father and better friend every single day I'm alive.

Late John Lewis said "If you show me a man who never made a mistake, I'll show you the man who never did anything." Of course, unlike a person who sits idly and does nothing significant, a person who is engaged in various activities and constantly interacts with people on different level is more likely to make mistakes. That's part of our innate weak nature as a fallible limited creatures. However, it would be wrong to establish ourselves on mistakes, while we have ways and means to rectify ourselves.

The Prophet Muhammad (pbuh) has been reported to have said "Every son of Adam makes mistakes. And the best of those who make mistakes are those who [truly] repent." Did I repent? I truly hope I DID. Did I learn my lesson? I truly hope I DID.

I pray to the Almighty God, in whose hands lie all His creation's hearts, to soften your heart towards me and my family and have mercy on us. For I strongly believe that if/when we show mercy to our fellow human beings the One in the heaven will show mercy on us when we need it most. And we need His help and mercy all the time.

I really appreciate you for bearing with me and reading my long letter. Thank you Sir! Thank you!

Sincerely and truthfully,

Dilshod Khusanov
Reg.# 52578424
MDC Brooklyn

Each day, where you have to be able to survive, before going to bed, I thank God for helping me make it through.

For the past five years I've seen so many things, both terrible and more terrible, that I can write volumes of thriller and drama books. But I'll focus only on few of them in short detail.

Early 2018 I was put to two-hour watch-list for no obvious reason. Every two hours starting from 6 AM to 8 PM I had to report to CO's (correctional officer) office. Any time I was, 5 or 10 minutes, late they would threaten me with sending me to SHU (special housing unit). When I was 5 or 10 minutes early they ^{would} send me back and tell me to come back at exact time. I could not take a nap, work out, study, read or watch anything on TV normally, like everybody else in here, for fear of missing the exact reporting time and being sent to the SHU. Sometimes, when I was late, a little bit, they would call my name in loud speaker and tell me to report to the CO's office, and sometimes they would start looking for me in the Unit. It caused a lot of suspicion and doubt among other inmates. Some thought I was reporting their illegal activities while others thought I was a snitch on my own case.

All my requests for explanation, why they imposed that on me, fell on deaf ears and were completely ignored. Every time, somebody saw me reporting to CO's office, I had to explain myself why I was doing that, in order to preserve my safety and integrity. I wrote to the whole administration starting from the Unit Team all the way to the Warden, but received no response at all. This lasted for 6-7 long months until my attorney got involved.

Then came Black-out of 2019. Almost ten agonizing and stressful dark days with no light, no heat, no hot water, no shower, no phone, and no computer access at all. We were completely cut off from the outside world and our condition was very miserable.

At the beginning, the jail administration was saying that it might take a month or two to fix the problem. Thanks to the support of hundreds if not thousands of people, who gathered outside the jail pressing the administration to solve the problem as soon as possible, in 9 days they fixed it and restored everything to normal operation.

Then came the virus. Early 2020 we were hit by Covid 19. They imposed a strict and severe lock-down policy. 24/7 we were locked down with no hot food, no hot water, no showers or any kind of communications with our families. Later on they let us out of the cells for 15 minutes 3 times a week only for showers. Over the period of two years they had been changing this rec time (out-of-cell) from 15 to 30 minutes, then to 1 hour, then to 3 hours, then back to 15 minutes. And sometimes we would not be allowed to come out of the cells for days.

Given the fact that I've inherited some claustrophobic traits from my mother, it was even tougher on me to be locked up in 6 X 10 Ft. cell for 24 hours a day. At times I felt walls closing on me. In order to avoid these kind of feelings I had to force my self to go to sleep more often.

Around early April they brought a guy from, as he told everybody at that time, the SHU (he later on admitted he lied to us because one of the CO's had told him if he told everybody that he got Covid and he was coming from quarantine nobody would allow him to go to any cell). He looked as weak as a kitten. Everybody refused to take him to their cell for he looked very sick and miserable. Here my empathy kicked in and I took him in. Couple of days later I became sick and was bed-ridden. I thought it was heavy flu, so I did not report my state to sick call (sick call was not responding any-ways for no reason). Due to my chronic asthma it was really heavy on me. Thanks God I recovered but I lost my taste and smell senses. There was no difference eating a bread or cookie, fruit or vegetable. Everything tasted

the same. Until this day I did not restore my senses for taste and smell I had before Covid.

Then came November of 2020. A big wave of Coronavirus hit the MDC Brooklyn. Fifty something people out of eighty something became sick with the virus. I was one of them, to my big surprise, for I thought I had developed an immunity against it when I got sick first time eight months ago. This time it was even worse. I had an excruciating pain throughout my body. I barely could lift my head or move my limbs. I literally had to crawl to use a bathroom. I had very severe shortness of breath. To my multiple pleas to allow me take a walk in the recreation area in order to get some fresh air, the CO's would boldly tell me 'No'. Even the doctor told me that he could not intercede in this, for allegedly there were too many inmates with chronic asthma. If he gave me some kind of permit to take a short walk then he had to issue that permit for others too. He told me that he was not authorized to do that. So I realized I should not expect any help from men.

Month of Ramadan (month of fasting for Muslims) was another painful experience in 2020. Instead of having a peaceful and calm Ramadan, as we are supposed to have, we had stressful and difficult one. According to MDC protocol, approved and signed by the Captain, they had to let the participants come out of their cells in order to heat up their food, get some hot water and prepare to break the fast. But some CO's decided not to let us out and refused to let us use the amenities we were entitled to. When we complained to higher officers they sided with those CO's who violated our Constitutional right to practice our religion instead of redressing our grievances. And this made already tough situation due to Covid even worse to bear.

Dental service is another horrible nightmare in this jail. First of all, it takes them at least 3-4 months to call you once you place your request, if you are lucky, otherwise even longer. And you have to request to be seen over and over until they put you in the wait list. Even in emergency situation, when you can not eat, sleep or even talk properly due to a throbbing pain and swollen face, it still takes them months and weeks to address your problem. When you ask them, to cure or do root canal procedure to save the tooth, early on at the beginning of caries they point-blank refuse to do that by saying "We don't do it in here. When you go to your designated prison they can do that over there." And they send you back after prescribing a pain-killer pills and telling you to request to be seen when you can endure the pain anymore. They don't see any problem with it. This is how I lost four of my molar teeth.

One of the worst of all was, and still is, to live with/among different violent gangs. They take control of some, if not all, amenities like phone, TVs and etc. They even control food distribution and decide who works in the kitchen and other orderly jobs. If counselor or Unit Manager appoints somebody to an orderly job who is not a gang member they try and do everything to get rid of him. They even resort to beating and stabbing just to get for their man a job. And this got even worse during the pandemic. Because everybody was in severe lock-down except orderlies. They would do anything dishonest and wrong to keep all the jobs within themselves. Constant stealings, cuttings, stabbings, abuse and oppression is a common practice of most of them. Constantly skipping and jumping the line in chow, phone and computer and disregarding and disrespecting commonly established rules of courtesy and peace became their normalcy. Always preying on the weak, lonely and helpless people, but not on the strong and vigilant. It made me constantly and consistently work out and stay alert for any potential danger. But to see how weak and sometimes old people were oppressed, and not being able to help them by itself, is very agonizing and

stressful experience. Anytime somebody wants to intercede in favor of the oppressed, they send him off by saying "Mind your own business bro". And sometimes, for fear of getting in trouble for somebody else and being sent to SHU or being ticketed which potentially could push my release and reunion with my family even further, I had to turn a blind eye to many wrong-doings that were being perpetrated every day and night.

Anyone who is allegedly cooperating with the government or a sex offender is immediately branded as 'rat' and 'chomo' (for child molester). And they give him two options, to pay for his stay and using the phones or leave the Unit. Ironically the same gang members who designated a guy as 'rat' or 'chomo', the day before, have no shame to come and ask his help in their case, if they find out that the guy has some knowledge and understanding of the law. This is how hypocritical and lawless these gangs are. To live among them and make it through is not an easy task which takes a lot of mental and physical strength which not everybody^{is} equipped with. I believe that must be one of the many reasons for committing suicide among inmates.

Truthfully,
Dilshod Khusanov
Reg. # 52578424

July 18, 2022

